

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

American Humanist Association, John Doe and Jane Doe, as parents and next friends of their minor child, Jill Doe,

Plaintiffs,

VS.

Greenville County School District,

Defendant.

C.A. No. 6:13-cv-02471-BHH

**CONSENT MOTION FOR LEAVE TO
SUBMIT RESPONSES TO
SUPPLEMENTAL MEMORANDA**

Plaintiff, American Humanist Association and Defendant, Greenville County School District, hereby jointly move the Court for an order permitting them to file responses to each other's initial memoranda filed on August 9 and August 10, respectively. As grounds for this motion, the parties would show:

- 1) The scheduling orders submitted by the parties did not include a provision for filing responses to supplemental memoranda.
- 2) The parties believe that responses to each other's memoranda will assist in clarifying the issues before the Court and assist the Court in deciding Plaintiff's motion for injunction.
- 3) The parties will file responses to supplemental memoranda on or before September 7, 2018.

WE SO MOVE AND CONSENT:

AMERICAN HUMANIST ASSOCIATION

s/Monica Miller

Monica L. Miller

mmiller@americanhumanist.org

1777 T Street, N.W., Washington, D.C.
20009

(202) 238-9088

CA: 288343 / DC: 101625

Aaron J. Kozloski, Fed. ID No. 9510

aaron@capitolcounsel.us

P.O. Box 1996, Lexington, SC 29071

803-465-1400

Attorneys for Plaintiffs

HALLIGAN MAHONEY & WILLIAMS

s/Thomas K. Barlow

Thomas K. Barlow, Fed. I.D. No. 7483

tbarlow@hmwlegal.com

John M. Reagle, Fed. I.D. No. 7723

jreagle@hmwlegal.com

P.O. Box 11367

Columbia, South Carolina 29211

(803) 254-4035

R. Douglas Webb, Fed. I.D. No. 11491

General Counsel

Greenville County School District

P.O. Box 2848

Greenville, SC 29602

rdwebb@greenville.k12.sc.us

Attorneys for Defendant